AMENDMENTS TO THE DRAWINGS

In the Office Action, the Examiner objected to FIG. 6 stating that FIG. 6 fails to show the vertical broken line illustrating justification of the text blocks as described in specification on pg. 11, lines 15-18. Applicants submit that FIG. 6 as originally filed does indeed include the broken line. Nevertheless, Applicants submit herewith a replacement drawing sheet for FIG. 6 for the present application that more clearly illustrates the broken line showing justification of the text blocks. No new matter has been added by way of this amendment.

REMARKS

This amendment is responsive to the Office Action dated April 5, 2005. Applicants have amended claims 1, 2, 4, 6, 13, 15, 17, 27-30 and 32. Claims 1-37 remain pending.

Claim Objections

The Examiner objected to claim 37 due to informalities. Applicants have amended claim 37 to correct the misspelling of the word "remote." Applicants thank the Examiner for pointing out the error.

Claim Rejection Under 35 U.S.C. § 102

In the Office Action, the Examiner rejected claims 1, 2, 4, 5, 8-10, 12, 13, 15-17, 19, 20, 23, 24, 26-28, 30, 31, 35 and 36 under 35 U.S.C. 102(b) as being anticipated by background information provided by the Applicants (referred to by the Examiner as Applicant Admitted Prior Art (AAPA)).

For purposes of clarification, Applicants have amended independent claim 1 to require a method comprising receiving configuration input that includes a first text block defining a data channel and one or more additional text blocks not contained within the first text block that define one or more data sub-channels within a network link, wherein the text blocks include references that hierarchically relate the data channel and the data sub-channels.

In a similar manner, Applicants have amended claim 13 to require a computer-readable medium having configuration input comprising a first text block defining a data channel and one or more additional text blocks not nested within the first text block that define at least one data sub-channel within a network link, wherein the first text block includes references to the additional text blocks to hierarchically relate the data channel and the sub-channel.

Applicants have amended claim 17 to require a network device comprising a computer-readable medium to store configuration input having a first text block defining a data channel and a set of additional non-nested text blocks external to the first text block defining at least one data sub-channel, wherein the text blocks include references relating the data channel and the sub-channel.

Applicants have amended claim 27 to require a computer-readable medium having instructions therein for causing a processor within a network device to present a text-based interface to receive configuration input having a first text block defining a data channel and a set of additional non-nested text blocks external to the first text block defining one or more data sub-channels within a network link, wherein the text blocks include references that hierarchically relate the data channel and the data sub-channel.

Applicants respectfully traverse the rejection to the extent such rejection may be considered applicable to the amended claims. AAPA fails to disclose each and every feature of the claimed invention, as required by 35 U.S.C. 102(b), and provides no teaching that would have suggested the desirability of modification to include such features.

As described by the background information provided by Applicants (relied upon by the Examiner as AAPA), certain conventional routers typically support a text-based interface in which the administrator enters configuration input that describes the channelization of the network link in a continuous, nested format. As illustrated on pages 2-3 of the present application, an outer text block contains the configuration data for a channel (interface oc12-1/1/1 in the example) and also contains additional, nested text blocks of configuration data for the sub-channels. Text for each lower-level sub-channel is contained and nested within configuration text for higher-level channels, and indented to a level that shows the hierarchical relationship of the channels and sub-channels. As the complexity of the channelization supported by the router increases, the level of nesting increases and configuration data may begin wrapping or clipping within the display viewed by the administrator.

Thus, with respect to amended claim 1, AAPA fails to teach or suggest a first text block defining a data channel and one or more additional text blocks not contained within the first text block that define one or more data sub-channels within a network link. Moreover, AAPA fails to teach or suggest configuration input therein comprising a first text block defining a data channel and one or more additional text blocks not nested within the first text block that define, as recited by Applicant's claim 13 as amended. Similarly, AAPA fails to teach or suggest configuration input having a first text block defining a data channel and a set of additional non-nested text blocks external to the first text block defining at least one data sub-channel, as required by claims 17 and 27.

With respect to dependent claim 2, AAPA fails to teach or suggest the references are labels that uniquely identify the one or more other text blocks within the configuration input that are external to the first text block. Again, typically routers support a text-based interface in which the administrator enters configuration input that describes the channelization of the network link in a continuous, nested format.

In order to support an anticipation rejection under 35 U.S.C. 102(b), it is well established that a prior art reference must disclose each and every element of a claim. This well known rule of law is commonly referred to as the "all-elements rule."[1] If a prior art reference fails to disclose any element of a claim, then rejection under 35 U.S.C. 102(b) is improper. [2]

For at least these reasons, AAPA fails to disclose each and every limitation set forth in claims 1, 2, 4, 5, 8-10, 12, 13, 15-17, 19, 20, 23, 24, 26-28, 30, 31, 35 and 36, and the rejection should be withdrawn.

Claim Rejection Under 35 U.S.C. § 103

In the Office Action, the Examiner rejected claims 3, 6, 11, 18, 21, 25, 29, 32, 34 and 37 under 35 U.S.C. 103(a) as being unpatentable over AAPA in view of Nulu et al. (USPN 6,650,347). Applicants respectfully traverses the rejection to the extent such rejections may be considered applicable to the claims as amended. The applied references fail to disclose or suggest the inventions defined by Applicant's claims, and provide no teaching that would have suggested the desirability of modification to arrive at the claimed invention.

Claims 3, 25 and 29

With respect to claims 3, 25 and 39, AAPA in view of Nulu fails to teach or suggest resolving the references to the text blocks within the configuration input, and constructing a hierarchical data structure to store the configuration input based on the resolution of the references. The Examiner correctly recognized that AAPA does not teach or suggest resolving

[1] *See Hybritech Inc. v. Monoclonal Antibodies, Inc.*, 802 F.2d 1367, 231 USPQ 81 (CAFC 1986) ("it is axiomatic that for prior art to anticipate under 102 it has to meet every element of the claimed invention").
[2] *Id. See also Lewmar Marine, Inc. v. Barient, Inc.* 827 F.2d 744, 3 USPQ2d 1766 (CAFC 1987); *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (CAFC 1990); *C.R. Bard, Inc. v. MP Systems, Inc.*, 157 F.3d 1340, 48 USPQ2d 1225 (CAFC 1998); *Oney v. Ratliff*, 182 F.3d 893, 51 USPQ2d 1697 (CAFC 1999); *Apple Computer, Inc. v. Articulate Systems, Inc.*, 234 F.3d 14, 57 USPQ2d 1057 (CAFC 2000).

references to the text blocks and constructing hierarchical data based on the resolution. Nevertheless, the Examiner rejected claims 3, 25 and 29 over AAPA in view of Nulu.

In general, Nulu describes a graphical user interface for maintaining networking hardware. FIGS 2 and 3 relied upon by the Examiner show "architectural perspectives" having "icons" that graphically illustrate the architecture of the hardware equipment being configured. Thus, AAPA in view of Nulu fails to teach or suggest the resolution of textual references to text blocks at all. Nulu describes a graphical user interface (GUI) that provides a graphical representation of an architecture and is not concerned with textual configuration data at all. None of the references, either singularly or in combination, teach or suggest resolving textual references to the text blocks within the configuration input, and constructing a hierarchical data structure to store the configuration input based on the resolution of the references.

Claims 6 and 32

With respect to claim 6 and 32, the Examiner correctly recognized that AAPA does not teach or suggest justifying the first text block and the additional text blocks at or near a common margin within a display. In rejecting claims 6 and 32, the Examiner states that Nulu teaches justifying configuration text [blocks] at or near a common margin relies on Nulu FIG. 3 and col., 6, ll. 5-20 and col. 6, ll. 23-28. However, the Examiner's reasoning is flawed for at least two reasons.

First, FIG. 3 relied upon by the Examiner does not show configuration text but is a graphical illustration of the architecture of the hardware equipment being configured. Nulu specifically refers to the GUI as presenting graphical "icons" representing the resources of the hardware. Thus, AAPA in view of Nulu does not teach or suggest justifying text blocks of configuration data, as required by claims 6 and 32.

Second, as clearly illustrated in FIG. 3, the Nulu system positions the graphical "icons" representing the hardware resources at respective indents that represents the hierarchical arrangement of the resources. Thus, AAPA in view of Nulu fails to teach or suggest justifying configuration data for a first text block for a channel and additional text blocks for sub-channels of that channel at the same, common margin. To the contrary, at col. 6, ll. 7-9, Nulu refers to

FIG. 3 and specifically states that graphical icons representing lower level resources are indented from the upper level resources:

> [T]he visual display of the resource tree as a whole should (as discussed) make the box architecture readily apparent. In the embodiment of FIG. 3, this is accomplished by: 1) placing lower level resources directly beneath the next highest level resource and 2) **indenting** and tracing each lower level resource to its next highest level resource (emphasis added).

For at least these reasons, the AAPA in view of Nulu fails to establish a prima facie case for non-patentability of Applicant's claims 3, 6, 11, 18, 21, 25, 29, 32, 34 and 37 under 35 U.S.C. 103(a). Withdrawal of this rejection is requested.

CONCLUSION

All claims in this application are in condition for allowance. Applicants respectfully request reconsideration and prompt allowance of all pending claims. Please charge any additional fees or credit any overpayment to deposit account number 50-1778. The Examiner is invited to telephone the below-signed attorney to discuss this application.

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